

# Fact Sheet



## *For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

Permit Number: R30-07700001-2009

Application Received: 12-10-2007

Plant Identification Number: 07700001

Permittee: Monongahela (MON) Power

Facility Name: Albright Power Station

Mailing Address: 800 Cabin Hill Drive, Greensburg, PA 15601

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Physical Location:	Albright, Preston County, West Virginia
UTM Coordinates:	617.00 km Easting • 4,372.00 km Northing • Zone 17
Directions:	From Morgantown, WV travel on I-68E. Take WV-26 Exit, Exit No. 23 towards Bruceton Mills, Take right on WV-26. Travel approximately 7.1 miles to the power plant.

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### **Facility Description**

The Albright Power Station is a fossil fuel fired electric generation facility with two 80 MW and one 140 MW unit and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of two (2) 954 MM Btu/hr coal-fired boilers, one (1) 1342 MM Btu/hr coal-fired auxiliary boiler, one (1) 350 KW diesel-fired emergency generator, and various supporting operations such as coal handling, ash handling and various tanks with insignificant emissions. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

### **Proposed Changes Incorporated by Renewal**

This renewal permit incorporates the addition of 2 - 20,000 gallon fuel oil tanks that will replace 4 existing underground tanks. Additionally, a new 1,500 gallon gasoline tank has been installed to replace 1 existing 1,000 gallon underground tank. The renewal incorporates a new minor source NSR permit number R13-2752, which incorporates the use of biomass fuel. The renewal permit also defines new part 64 CAM monitoring for PM.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2006 Actual Emissions</b>
Carbon Monoxide (CO)	300	119.6
Nitrogen Oxides (NO <sub>x</sub> )	6,828	2,250
Particulate Matter (PM <sub>2.5</sub> )	290	
Particulate Matter (PM <sub>10</sub> )	626	
Total Particulate Matter (TSP)	1,132	169.3
Lead (Pb)	0.102	0.01
Sulfur Dioxide (SO <sub>2</sub> )	45,553	15,229
Volatile Organic Compounds (VOC)	36	14.7

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2006 Actual Emissions</b>
Mercury	0.36	0.06
Hydrogen Chloride	789	315.6
Hydrogen Fluoride	77	30.5
Selenium	1.84	0.74

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

This facility has the potential to emit 45,553 tons per year of SO<sub>2</sub>, 6,828 tons per year of NO<sub>x</sub>, 1,132 tons per year PM, 300 tons per year CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Albright Power Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:  
 Federal and State:

45CSR2	Control of particulate matter emissions.
45CSR6	Open burning prohibited.
45CSR10	Control of sulfur dioxide emissions.
45CSR11	Standby plans for emergency episodes.
45CSR13	Permits for Construction, Modification, Relocation, and Operation of Stationary Sources.

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	45CSR26	NOx Budget Trading Program EGUs
	45CSR30	Operating permit requirement.
	45CSR33	Acid Rain Provisions and Permits
	40 C.F.R. 61	Asbestos inspection and removal
	40 C.F.R. 64	Compliance Assurance Monitoring
	40 C.F.R. 72	Permits Regulation
	40 C.F.R. 73	Sulfur Dioxide Allowance System Permits Regulation
	40 C.F.R. 74	Sulfur dioxide Opt-ins
	40 C.F.R. 75	Continuous Emissions Monitoring
	40 C.F.R. 76	Nitrogen Oxides Reduction Program
	40 C.F.R. 77	Excess Emissions
	40 C.F.R. 78	Appeals Procedure for Acid Rain Program
	40 C.F.R. 82, Subpart F	Ozone Depleting Substances
State Only:	45CSR4	No objectionable odors.
	45CSR37	Mercury Budget Trading Program
	45CSR39	NOx Annual Trading Program
	45CSR40	NOx Ozone Season Trading Program
	45CSR41	SO <sub>2</sub> Trading Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
Albright Acid Rain Permit	December 26, 2002	Effective January 1, 2003
Albright NOx Budget Permit	February 7, 2002	
PD00-179	November 20, 2000	No Permit Needed - Determination for installation of a larger fly ash silo dust bin filter.
R13-2752	July 30, 2008	Incorporation of Biomass Fuel Source

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's

operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

## Determinations and Justifications

This renewal permit recognizes the removal of (4) underground fuel oil tanks, which will be replaced with (2) 20,000 gallon, above ground storage tanks. The fuel oil is listed as having a vapor pressure below the applicability threshold, (2.2 psi) of 40 CFR 60, Subpart Kb. Additionally, (1) 1,500 gal gasoline tank will be used to replace an existing 1,000 gal underground storage tank. This tank is recognized as being below the applicability thresholds of NSPS Kb, referenced above (19,813gal). It should also be noted that since these sources do not have any applicable requirements and emit HAPs a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all like HAP sources, these tanks qualify as an insignificant activity under Title V.

State Rule 45CSR37 became effective and was incorporated into the permit as Section 3.1.11. 45CSR37 is tied to the provisions of the federal CAMR program, which has been vacated. The DEP has initiated the process to repeal 45CSR37, however the repeal will not take effect until June 2009. Until such time as 45CSR37 is repealed, it remains an applicable requirement therefore the requirement must remain in the permit. The DEP has issued an order, #CO-R37-C-2008-4, holding the requirements of 45CSR37 in abeyance pending resolution of the federal litigation. The provisions of 45CSR39, 45CSR40, and 45CSR41 are tied to the federal CAIR program, which was similarly vacated although, more recently (July 11, 2008). This vacature remanded CAIR back to EPA to re-write. It is supposed that the EPA would ask for a rehearing on the matter or appeal the ruling to the Supreme Court. To this date, no further action has occurred to reinstate the CAIR rules and it is not likely to happen given the courts finding to vacate the rule was unanimous. Given this, the WVDEP Division of Air Quality (DAQ) is placing these rules on hold and thus leaving them out of this Title V permit. Although considered "on hold," these rules are listed in the State-only Enforceable section of this fact sheet. The DAQ will take the necessary steps to reopen this permit in the event this vacature is reversed.

**40 C.F.R. 64** – Compliance Assurance Monitoring (CAM) – Precontrolled potential emissions of SO<sub>2</sub>, NO<sub>x</sub>, CO and PM exceed major source thresholds for each of the three units. As a result of being subject to the Acid Rain Program requirements pertaining to SO<sub>2</sub> and NO<sub>x</sub> emissions, these pollutants are exempt from CAM requirements. Additionally, since there is no control limitations placed on CO, this pollutant is also exempt from the CAM requirements. However, each unit is equipped with an electrostatic precipitator (ESP) that is used to comply with the federally-enforceable PM emission limits associated with their operation therefore each unit represents a pollutant specific emission unit (PSEU). The submitted plans meet the requirement of the CAM rule.

With respect to monitoring and recordkeeping pertaining to PSEUs, MON Power has proposed to utilize a temporary tapered element oscillating microbalance (TEOM) continuous PM monitor to calibrate their existing COMs. The COMs will be calibrated for PM (lb/hr) weight rates using one minute averages measured simultaneously over 1000 points. The TEOM results as compared to Methods 5 and 17 were validated via Method 301 at another site. The test results using the TEOM received site specific approval from US EPA on October 3, 2002 under the NSPS program.

The permittee plans on validating the TEOMs calibration during the source's periodic 45CSR2 Method 5 PM stack testing, provided no additional guidance from EPA comes to light that would indicate the TEOMs is accepted as an alternative to Method 5 on a source category wide basis or site specific calibration of the TEOMs is not necessary in light of historic validation results.

As part of the facility's CAM plan, the company has proposed to use continuous opacity monitoring in order to demonstrate continuous compliance with existing PM limitations as well as opacity requirements. Since the COMs opacity measurement will be calibrated to also demonstrate compliance with PM (lb/hr) limits, this monitoring will offset the need to conduct continuous parametric monitoring surrounding the operations of the source's electrostatic precipitator (ESP).

After calibrating the COMs for PM, MON Power does not intend to continuously operate the Series 7000, TEOM, but will however, use the 1 minute opacity readings to define an hourly average opacity as a measure of PM weight rate as well as continue to stack test each of the units in accordance with their 45CSR2 testing schedule defined within Section 4.3 of the renewal permit.

MON Power has proposed to perform emissions testing to establish a relationship between their existing continuous opacity monitor (COM) and a temporary continuous particulate sampler, the TEOM 7000 Source Particulate Monitor, by collecting continuous particulate data. MON Power has also stated that the flow and CO<sub>2</sub> CEMs measurements will be used in conjunction with the calibrated opacity data, which results in the stack concentration of PM to produce a real time pounds per hour and pounds per MMBtu calculation of PM. More specifically, the PM concentration coupled with the flow rate is used to define the actual pounds per hour emitted from each stack. Additionally, the pounds per hour measurements are then converted to pounds per heat input (MMBtu) by use of the following equation:

$$\text{Heat Input} = (\text{stack flow}) * (1/F_c) * (\% \text{CO}_2/100), \text{ where } F_c = 1800 \text{ (for bituminous coal)}$$

The CAM related testing and CAM plan implementation will be conducted according to the following schedule:

1. MON Power Co. shall submit a CAM testing protocol to the Department at least 30 days prior to the proposed test date.
2. MON Power Co. shall complete the CAM testing within 120 days of the issuance of this permit.
3. Testing results, including the excursion limits, and the generated opacity to particulate matter correlation curve shall be submitted to the Department within 45 days after completion of testing.
4. Within 15 days of submittal of the testing results and the generated opacity to particulate matter correlation curve, Allegheny Energy shall begin implementation of the CAM plan. However, under no circumstances shall the CAM implementation plan, which includes completing installation and beginning operation of the monitoring, exceed 180 days beyond permit issuance.

Monitoring per the CAM plan for MON Power's Albright Generating Station will be as follows:

Units B1, B2, and B3		Indicator No. 1	Indicator No. 2
I.	Indicator	Opacity	CEMs and Calculated PM Emission Rates
	<b>Monitoring Approach</b>	Opacity data is measured and recorded for each stack by a certified opacity monitoring system in accordance with 45CSR§2A-6. The one minute average opacity data will be used as an input to calculate one minute TSP emission rates.	Stack flow data and CO <sub>2</sub> data will be monitored and recorded on a continuous basis by certified CEMs in accordance with 45CSR§10-8.2.c, Monitoring Plan, Revision #1, approved August 30, 2001. An equation will be developed using the opacity vs. PM concentration correlation curves, and CEMs data as determined during proposed TEOM testing; the data acquisition system (DAS) will then be programmed to calculate PM emissions in (lb/hr) and (lb/MM Btu).
II.	<b>Indicator Range or Designated Condition</b>	Opacity will be used as an input to the DAS in order to calculate PM emissions. An excursion will be defined as any six-minute block average opacity exceeding 10%, as established in 45CSR§2-3.1.	An excursion will be defined as a hourly average PM emission rate that exceeds the 47.7 lb/hr limit (0.05 lb/MM Btu) established for boilers B1 and B2 or the 67.1 lb/hr limit (0.05 lb/MM Btu) established for boiler B3, as established in 45CSR§2-4.1.a.
III.	<b>Performance Criteria</b>	The COMs meet the performance	The CEMs are installed, maintained and

Units B1, B2, and B3			Indicator No. 1	Indicator No. 2
	A.	<b>Data Representativeness</b>	criteria contained in 40 C.F.R. 60, Appendix B, PS-1, “Specifications and Test Procedures for Opacity Continuous Emissions Monitoring Systems in Stationary Sources.”  The COM meets the performance criteria for installation and operation in accordance with 45CSR2A-6.2.	operated in compliance with 40 C.F.R 75, and as specified in 45CSR§10.8.2.c.1. PM emissions will be determined using inputs from the COMs and CEMs, generating the opacity vs. PM correlation curves during the TEOM testing, using at least 1,000 paired data points, which is representative of a normal full daily cycle of operations for each of the three PSEUs.
	B.	<b>Verification of Operational Status</b>	N/A	N/A
	C.	<b>QA/QC Practices and Criteria</b>	The COM QA/QC procedures are consistent with 45CSR2A-6.2. “COMs Based Monitoring Plan” and 40 C.F.R. §75.21.	CEMs QA/QC practices are conducted in accordance with 40 C.F.R. §75.21.  The PM emissions data collected by the TEOM 7000 will be validated in accordance with manufactures’ recommendations, and as conditionally approved by EPA as an alternative reference method.
	D.	<b>Monitoring Frequency</b>	Opacity is measured on a continuous basis with the exception of periods when the fans are off and there is no flame in the boiler. Data from the back-up monitoring system is used during QA/QC periods and monitor malfunction periods.	Stack flow and CO <sub>2</sub> data is collected on a continuous basis, with the exception periods where the boiler is off-line (no flame), and hourly averages are calculated from these minute averages.
		<b>Data Collection Procedures</b>	Opacity data is collected on a continuous basis on a certified DAS.	Stack flow and CO <sub>2</sub> data is collected via a certified DAS.
		<b>Data averaging periods</b>	One minute data is averaged from continuous readings, and hourly averages are in turn calculated and stored from the on-minute data.	One minute data is averaged from continuous readings, and hourly averages are in turn calculated and stored from the on-minute data.

### MACT 112(g) Applicability

WV DAQ is awaiting EPA guidance on the possibility that EGUs may become subject to Case-by-Case MACT determinations for new or modified units. This is a direct result of the mandate issued by US Court of Appeals for the DC Circuit on March 14, 2008. This mandate vacated EPA’s delisting of EGUs as a source category required to be regulated under CAA section 112 and EPA’s CAMR program. MON Power’s Albright Station is not expected to be considered new or modified, however it is anticipated that EPA will define dates and thresholds which pertain specifically to EGUs.

The court vacature as referenced above also has a bearing on 45CSR37 since is it closely linked to EPA’s CAMR program. Until this state Rule is removed from law by the Legislature, Rule 37 requirements remain in effect.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. 60  
 Subpart K, Ka

All tanks are below 40,000 gallons in capacity.

40 C.F.R. 60, Subpart Kb:	All new tanks constructed after July 23, 1984 are less than the capacity threshold of 19,813 gallons and/or have a vapor pressure less than 2.2 psi.
40 C.F.R. 60, Subpart D:	Albright's main boilers were constructed prior to August 17, 1971
40 C.F.R. 60, Subpart Da:	Albright's Units 1 and 2 boilers constructed before September 18, 1978
40 C.F.R. 60, Subpart Db:	Albright's Unit 3 boiler was constructed prior to June 19, 1984
40 C.F.R. 60, Subpart OOO:	Coal crushing, grinding, and screening equipment was installed and in operation prior to August 31, 1983
40 C.F.R. 60, Subpart Y:	Equipment was not installed or modified after October 24, 1974; coal handling and storage equipment is not directly interfaced with coal breakers or coal crushers.
40 C.F.R. 63, Subpart Q:	Albright's new cooling tower started construction in 2007 and is planned to be complete by the end of October 2008. The new tower will not use any chromium based water treatment chemicals and therefore, is exempt from the referenced regulation.
45CSR5:	The Rule to Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations, and Coal Disposal Areas is not applicable to the facility since 45CSR2 applies.
45CSR17:	The Rule to Prevent and Control Particulate Matter Air Pollution from Material Handling Preparation, Storage, and Other Sources of Fugitive Particulate Matter is not applicable to the facility since 45CSR2 applies.

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: October 25, 2008

Ending Date: November 24, 2008

All written comments should be addressed to the following individual and office:

Jesse Hanshaw, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## Point of Contact

Jesse Hanshaw, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304  
Phone: 304/926-0499 Ext., 1216 • Fax: 304/926-0478

## Response to Comments (Statement of Basis)

On December 23, 2008, the U.S. Court of Appeals for the D.C. Circuit decided to remand to EPA without vacature the Clean Air Interstate Rule (CAIR). As such, Conditions (3.1.12 through 3.1.14) have been added to the permit.

The DAQ received comments from EPA on December 10, 2008. EPA's comments along with DAQ responses are provided below.

### EPA COMMENTS:

Fact Sheet:

1. Emissions Summary: The emissions summary lists the potential emissions and 2006 actual emissions for multiple pollutants. There are blanks for the 2006 Actual Emissions for PM<sub>2.5</sub> and PM<sub>10</sub>. Please explain.

DAQ Response: The actual emission numbers in the Fact Sheet come from our (WVs) Certified Emission Statement invoices and do not speculate out PM<sub>2.5</sub> and PM<sub>10</sub>. Therefore, the TSP information is all that is currently available.

2. 40 CFR 64 - Compliance Assurance Monitoring (CAM): In this section you discuss using the TEOM 7000 Source Particulate Monitor to collect continuous particulate emission rate information and opacity readings. The TEOM 7000 has been discontinued per the manufacturer ([http://www.thermo.com/eThermo/CMA/PDFs/Product/productPDF\\_2007.pdf](http://www.thermo.com/eThermo/CMA/PDFs/Product/productPDF_2007.pdf)). Therefore, does the source still intend to use this monitor or do they plan to use the replacement? Please clarify.

DAQ Response: The testing contractor has purchased and plans to continue to use the TEOM 7000 version as the continuous PM monitoring device, which will be used to provide a calibration curve for PM vs Opacity.

3. 40 CFR 64 - CAM: The CAM related testing and CAM plan implementation schedule is laid out on page 5 of the fact sheet and permit condition 4.2.6. We feel this schedule is lengthy. 40 CFR 64.4(e) states the following, "If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of this part, the owner or operator shall include an implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable after approval of the monitoring in part 70 or 71 permit pursuant to section 64.6, but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit." Please adjust the testing and implementation schedule, listed in the fact sheet and permit condition 4.2.6, accordingly.

DAQ response: The specific requirement has been changed as requested. It now requires all testing and implementation to be completed within 180 days. The factsheet language and permit condition 4.2.6 both have been revised to reflect this point.

Permit condition 4.2.6 was changed to the following:

The CAM related testing and CAM plan implementation shall be conducted according to the following schedule:

1. MON Power Co. shall submit a CAM testing protocol to the Department at least 30 days prior to the proposed test date.



2. MON Power Co. shall complete the CAM testing within 120 days of the issuance if this permit.
3. Testing results, including the excursion limits, and the generated opacity to particulate matter correlation curve shall be submitted to the Department within 45 days after completion of testing.
4. Within 15 days of submittal of the testing results and the generated opacity to particulate matter correlation curve, Allegheny Energy shall begin implementation of the CAM plan. However, under no circumstances shall the CAM implementation plan, which includes completing installation and beginning operation of the monitoring, exceed 180 days beyond permit issuance.

#### Title V Permit:

1. General: EPA thinks it is a viable strategy to use the TEOM to correlate opacity and PM for CAM and we would like to review Monogahela Power's testing protocol prior to testing.

DAQ Response: Although no specific language was added to the permit, WV DAQ has agreed to send a copy of the protocol to EPA for review. The protocol will be forwarded to Amy Caprio electronically when received. Any input from EPA will be welcomed.

#### Company Comments:

1. As a result of EPA comments and working with MON Power to assure compliance with the 180 day time frame established within permit condition 4.2.6., DAQ asked for clarification on the timeline associated with the TEOM's validation testing addressed by permit condition 4.2.5. The Company responded to the DAQ's timing question by stating the following:

MON Power: With respect to your question concerning the TEOM validation testing, the opacity calibration testing will occur first, and that TSP data collected (1000 paired data points) during that testing will be validated using the procedures referenced in the citation.

DAQ Response: It was identified that the procedures referenced in the citation, noted above by the Company, relates to the conditional approval letter from Conniesue B. Oldham, EPA, for using the TEOMs as an alternative method, approved on a site specific basis. The folks involved with the original approval such as Ronald Myers, of EPA were questioned about the ramifications of this specific approval. As it seems no additional approvals were written since the 2002 time frame. Therefore, EPA had not made any conclusions to approve the use of TEOMs as a source category wide alternative. As a result, WV DAQ found it necessary to add Method 301 (40 C.F.R. 60, Appendix A) validation testing. The language was added to 4.2.5 in order to clarify the DAQs intent.

However, the method 301 validation testing was a topic of discussion, which extended the issuance date of this permit. As a result of timing constraints, WV DAQ agreed upon a compromise to allow the 301 testing to take place during the facility's periodic method 5 testing. Additionally, prior to the TEOM/Method 5/301 validation testing, the company may provide supporting documentation that would negate the need for site by site validation of the alternative test method if approved by WV DAQ.

Therefore, the revised permit language can be found in 4.2.5. as follows:

- 4.2.5. The TSP emission data collected by the TEOM 7000 shall be validated in accordance with manufacturer's recommendations as approved by EPA in the alternative Reference Method approval letter dated October 3, 2002, from Conniesue B. Oldham, EPA to Mr. Edward C. Burgher of Rupprecht & Patashnick Co., Inc.

Additionally, validation testing shall be conducted at the Albright Station during the next scheduled 45CSR2 stack testing event. At this time, data shall be collected by the TEOM 7000 in an effort to provide validation as an alternative method in accordance with EPA Method 301 (40 CFR 60 Appendix A). The TEOM results shall be compared to those obtained simultaneously, using Method 5 (40 CFR 60, Appendix A). Should the validation testing warrant a bias correction being applied, the existing TEOM 7000 / COM opacity calibration curve shall be updated to incorporate the new test data as well as revised to incorporate any necessary bias.

If, before the scheduled 45CSR2 Method 5 testing, Monongahela Power provides documentation, which supports the use of the TEOM 7000 method as a valid alternative to Method 5, the Method 301 validation testing will not be necessary. Any supporting documentation must be submitted to WV Division of Air Quality at least 90 days prior to the first scheduled 45CSR2 testing event. **[45CSR§30-5.1.c. and 40 C.F.R. § 64.3(b)(3)]**

2. The mailing address (Page 2) for Allegheny Energy's corporate office is no longer **4350 Northern Pike, Monroeville, PA 15146-2841**.

Please revise to:  
**800 Cabin Hill Drive  
Greensburg, PA 15601-1689**

**DAQ Response: The updated address was incorporated as requested.**